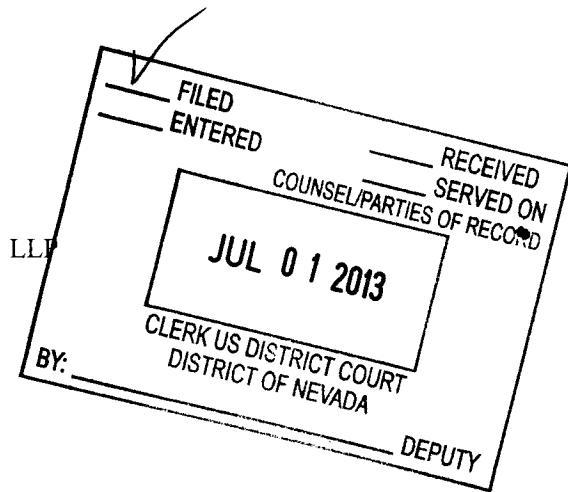


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10 Attorneys for Paragon Defendants



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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 ISSAC AVENDANO, an Individual;
11 and ROLANDO DUENAS, an
12 Individual,

13 Plaintiffs,

14 vs.

15 SECURITY CONSULTANTS
16 GROUP, INC., a corporation; UNITED
17 GOVERNMENT SECURITY
18 OFFICERS OF AMERICA,
19 INTERNATIONAL UNION, a labor
organization; UNITED
20 GOVERNMENT SECURITY
21 OFFICERS OF AMERICA, LOCAL
22 283, a labor organization; PARAGON
23 SYSTEMS, INC., a corporation; and
24 SECURITAS SECURITY SERVICES
25 USA, INC., a corporation,

26
27 Defendants.

CASE NO. 3:13-cv-00168-HDM-VPC
**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND
(First Request)**

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND
(First Request)**

4 IT IS HEREBY STIPULATED between Plaintiffs ISSAC AVENDANO and
5 ROLANDO DUENAS, by and through their counsel of record, John A. Tucker Co.,
6 L.P.A., and Ian E. Silverberg, Esq., P.C.; and Defendants SECURITY
7 CONSULTANTS GROUP, INC.; PARAGON SYSTEMS, INC.; and SECURITAS
8 SECURITY SERVICES USA, INC. (collectively, the “Paragon Defendants”); by
9 and through their attorneys of record, Lewis Brisbois Bisgaard & Smith, LLP, that
10 the time for the Paragon Defendants to respond to Plaintiffs’ Complaint in
11 accordance with Fed. R. Civ. P. 12 in this matter be extended ten (10) days from
12 July 1, 2013, to and including Thursday, July 11, 2013.

13 This stipulation is entered to allow counsel sufficient time to consult with
14 Paragon Defendants, who have offices outside of Las Vegas, Nevada.

15 | DATED this 27th day of June, 2013. DATED this 27th day of June, 2013.

16 JOHN A. TUCKER CO., L.P.A

**LEWIS BRISBOIS BISGAARD
& SMITH LLP**

19 /s/ John A. Tucker
20 JOHN A. TUCKER, ESQ.
21 OH. S.Ct. #0055052
22 11367 Lair Road NE
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/s/ Margaret G. Foley
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26 227 Clay Street
27 Reno, NV 89501
28 *Attorneys for Plaintiffs*

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ORDER

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Upon stipulation of the aforementioned parties, and good cause appearing,

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IT IS HEREBY ORDERED that the time for the Paragon Defendants to respond to Plaintiffs' Complaint in accordance with Fed. R. Civ. P. 12 in this matter is hereby extended ten (10) days from July 1, 2013, to and including Thursday, July 11, 2013.

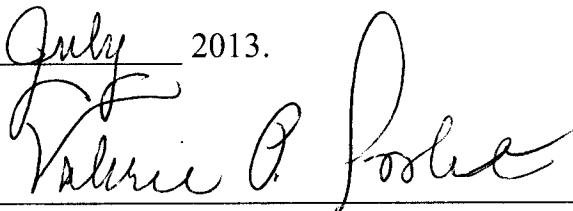
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DATED this 15 day of July 2013.

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Valerie P. Foster

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1 **CERTIFICATE OF SERVICE**

2 Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that I am an employee of
3 LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 27th day of June,
4 2013, I did cause a true and correct copy of the foregoing **STIPULATION AND**
5 **[PROPOSED] ORDER EXTENDING TIME TO RESPOND (First Request)** to
6 be served via the CM/ECF filing system to all parties on the service list.

7 John A. Tucker, Esq.
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13 *Counsel for Plaintiffs*

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19 *Counsel for Plaintiffs*

20 By /s/ Peggy Kurilla
21 An Employee of
22 LEWIS BRISBOIS BISGAARD & SMITH LLP
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